

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA, :

10 CR 228 (LTS)

- against – :

DANIEL BONVENTRE, ANNETTE
BONGIORNO, JO ANN CRUPI, a/k/a “Jodi,”
JEROME O’HARA, and GEORGE PEREZ, :

NOTICE OF MOTION

Defendants. :

TO: Preet Bharara, U.S. Attorney, Southern District of New York
Matthew L. Schwartz, Esq.
One St. Andrews Plaza
New York, NY 10007

PLEASE TAKE NOTICE THAT upon the enclosed Memorandum of Law of Defendant Jo Ann Crupi in support of her motions *in limine*, dated August 28, 2013, the undersigned will move this Court, before the Honorable Laura Taylor Swain, U.S.D.J., in the Southern District of New York, at a date and time to be set at the convenience of the Court, for an Order:

(1) Preventing the government from introducing evidence of the expenditures made with funds received by Ms. Crupi from Bernard L. Madoff Investment Securities (“BLMIS”) or the destination of funds received by Ms. Crupi from “BLMIS”;

(2) Preventing the government from introducing Ms. Crupi’s mug shot at trial;

(3) Preventing the government from moving duplicative exhibits into evidence;

(4) Preventing the government from introducing irrelevant and prejudicial victim impact evidence at trial; and

(5) for such other and further relief as this Court may deem just and proper.

Dated: August 28, 2013

/s/ Eric R. Breslin
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